

North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

1/19/06-03887



January 19, 2006

NAVFAC Atlantic
Attn: Daniel R Hood
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on the Operable Unit # 16, Site 93 Draft Proposed Remedial
Action Plan (PRAP), MCB Camp Lejeune, NC
NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Draft Proposed Remedial Action Plan (PRAP), dated January 2006 for Operable Unit (OU) #16, Site 93 at the Camp Lejeune, MCB Superfund Site. The following comments are included for the Partnering Teams consideration.

Specific Comments

1. Figure 2 shows the Operable Unit 16 Plume which is not being addressed by this PRAP. No explanation of the operable unit (OU) #16 plume is given in the background Section of the report. The State thinks that it is inappropriate to show the Site 89 part of the plume in this PRAP since it is not being addressed by this PRAP. If the OU plume is to be included in this Plan then the Site 93 **portion** of the plume should also be shown on the same Figure and clarification made in the Site Description and Background Section of the Report. This Section of the report should include the fact that this PRAP only addresses the Site 93 portion of the OU#16 Plume.
2. The third paragraph on page 7 states that "All alternatives meet ARARs." As you know Alternative #1, the No Action alternative does not meet ARARs since MCL and NCAC 2L Groundwater Standards are exceeded in the groundwater at this Site. Please re-phrase this sentence to state that "All alternatives meet ARARs except Alternative #1, the No Action Alternative."

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-508-8400 \ FAX: 919-715-3605 \ Internet: www.enr.state.nc.us

Mr. Daniel Hood

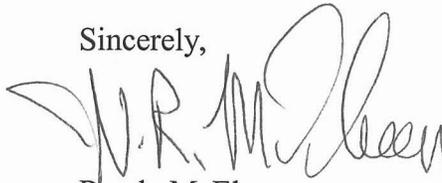
1-19-2005

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3. The last paragraph, on the left side of page seven, should be re-phrased to state that "Containment components (alternatives) such as reactive barriers have the greatest impact on mobility **when placed adjacent to or within the higher concentration plume,**". This will also make this sentence *more consistent* with the last part of this paragraph at the top right of page 7.
4. Please clarify the last sentence of the Implementability Section on page seven, to explain how "the fact that RAOs" being achieved in a shorter time frame increases ease of implementation over the life of the remedy. The meaning of this statement is not clear in this context.
5. The Public Comment Period discussed in Section 10.1 on page 9 may need to be changed to a later date as we discussed in the partnering meeting last week.
6. The last two sentences of Section 10.1 need to be changed to clarify where the self addressed page is located to provide comments to the Navy. This page was in the middle of my copy of the PRAP and did not need to be cut off. Please make appropriate changes.
7. The NC DENR representative, Randy McElveen, has a different telephone number as of September 2005. It is now (919) 508 8467 and the Superfund Section's Fax # is still (919) 733 2801. Please make these changes in the addresses and telephone numbers block on page nine. The 508 8400 Fax # is the division Fax number and the only 733 xxxx numbers that still exist in the Division of Waste Management is the Superfund Fax number.

If you have any questions or comments, please contact me, at (919) 508 8467 or email randy.mcelveen@ncmail.net

Sincerely,



Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, USEPA